

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

PABLO OLIVERA DOS REIS,
Petitioner.

v.

Civ. No. 25-10497

**EMERGENCY EX PARTE
REQUEST FOR TEMPORARY
RESTRAINING ORDER**

CALEB VITELLO,
Acting Director,
United States Immigration
and Customs Enforcement;
PAMELA JO BONDI
Attorney General of the United States)
of America
PATRICIA H. HYDE,
Acting Field Office Director,
Enforcement and Removal
Operations Boston Field
Office, United States
Immigration and Customs
Enforcement;
JOSEPH D. MCDONALD, JR.,
Sheriff,
Plymouth Sheriff's Office,

Respondents.

Pursuant to Federal Rule of Procedure 65, and for reasons set forth in the accompanying affidavit, Petitioner respectfully moves this court to issue a temporary restraining order on an emergency basis requiring Respondents to provide this Court and Petitioner's

counsel 48 hours notice prior to removing Petitioner from the Commonwealth of Massachusetts. A proposed order is attached.

Date March 2, 2025.

Respectfully Submitted,

PABLO OLIVERA DOS REIS

By and through his counsel,

/s/Carl Hurvich
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